

NOTICE OF REMOVAL

EXHIBIT 3

EXHIBIT B

UBS Securities LLC et al. v. Dondero et al.: Turnover Petition Exhibit B
Selected Payments and Transfers in Violation of 18 U.S.C. §§ 1956 (Money Laundering)

	<u>Payment From</u>	<u>Payment To</u>	<u>Date</u>	<u>Amount</u>	<u>Description and Comment</u>	<u>Ex. No.</u>
1.	CDO Fund; CDO Opportunity Fund; CDO Holding; SOHC; HFC; HFP	Sentinel	08/07/2017	\$11,073,331.00 (cash) and \$105,647,679.00 (aggregate fair market value)	Dondero and Ellington direct the transfer of substantially all assets of the Judgment Debtors and other Dondero-controlled entities (valued at \$105,647,679.00) to supposedly satisfy a \$25,000,000.00 premium on the ATE Policy that allegedly covered up to \$100,000,000.00 million in losses.	Ex. 98, Asset Purchase Agreement, at BC SEN0000089124-25 (Aug. 7, 2017); Ex. 46, Email from D. Willmore, at HCMUBS000563 (Aug. 11, 2017); Ex. 61, Email from R. Swadley, at HCMUBS003792 (Sept. 12, 2018) (attaching Tax Memorandum).
2.	Sentinel	Sebastian Clarke	12/31/2019	Over \$35,000,000.00	Dondero and Ellington direct the transfer of some of the 2017 Transferred Assets (described in row 1), including assets with a face value of over \$35,000,000.00, from Sentinel to Sebastian Clarke for \$3.00.	Ex. 99, Asset Transfer Agreement, at UBSPROD020567 (Dec. 31, 2019)
3.	Sentinel	Ellington	12/17/2019	\$21,557.04	Ellington directs a payment to himself for \$21,557.04 as a reimbursement under the ATE Policy for “travel and business meetings related to Sentinel.” There is no indication why such charges qualified as “risk-mitigation” under the ATE policy.	Ex. 73, Email from A. Devins, at BC SEN0000730549 (Dec. 17, 2019)

	<u>Payment From</u>	<u>Payment To</u>	<u>Date</u>	<u>Amount</u>	<u>Description and Comment</u>	<u>Ex. No.</u>
4.	Sentinel	Ellington	12/19/2019	\$318,934.88	Ellington directs a payment to himself for \$318,934.88 as a reimbursement from Sentinel. These expenses include \$42,324.00 from a single night at Sapphire, a Las Vegas strip club, \$97,706.19 at nightclub OMNIA, and \$152,142.13 at the Wynn casino and hotel in Las Vegas. [REDACTED] Ex. 117, Ellington Dep. 368:16-369:18 (Oct. 19, 2022). [REDACTED] [REDACTED] <i>Id.</i> at 370:20.	Ex. 75, Email from T. Adamczak, at BC SEN0000663342 (Dec. 20, 2019)
5.	Sentinel	Ellington	01/02/2020	\$43,353.54	Ellington directs a payment to himself for \$43,353.54 as a reimbursement from Sentinel for a private jet to travel to Toronto for work on the “settlement for the ATE matter.” [REDACTED] [REDACTED] Ex. 117, Ellington Dep. 368:24-369:4.	Ex. 77, Email from M. DiOrio, at BC SEN0000713384 (Jan. 2, 2020)
6.	Sentinel	Ellington	01/31/2020	\$176,334.77	Ellington directs a payment to himself for \$176,334.77 in fraudulent reimbursement expenses. [REDACTED] [REDACTED] Ex. 117, Ellington Dep. 365:6-10. [REDACTED] <i>Id.</i> at 366:19-368:11.	Ex. 80, Email from A. Devins, at BC SEN0000727324 (Feb. 6, 2020)

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7.	Sentinel	Ellington	3/12/2020	\$273,662.82	Ellington directs a payment to himself for \$273,662.82 as a reimbursement from Sentinel. Among the expenses Ellington reimburses are \$6,506.50 each in airfare for Kristen Leonardelli, Sara Leonardelli, and Julia Masiello, who have no affiliation with Sentinel. The expenses also include \$75,914.86 spent at two restaurants and a night club in one night in London.	Ex. 81, Email from A. Damien, at BC SEN0000777504 (Mar. 16, 2020)
8.	Mainspring	Tall Pine (owned by Ellington); Leventon; Waterhouse; Surgent	Summer 2020	\$5,464,665.00	Dondero and Ellington direct payments from Mainspring to Tall Pine (wholly owned by Ellington) and/or to entities owned by Leventon, Waterhouse, and Surgent for roughly \$5,874,203.21 as a part of the scheme to pay “bonuses” blocked by the Bankruptcy Court. Subsequent payments were then made to entities owned by Leventon, Waterhouse, and Surgent. The surplus in Tall Pine was left for Ellington’s use in fulfillment of his unpaid bonus.	Ex. 117, Ellington Dep. at 225:11-18 (Oct. 19, 2022); Ex. 19, Bk. Dkt. No. 2856, ¶ 32 (Sept. 21, 2021)
9.	Sentinel	Montage	04/24/2020	\$1,920,000.00	Dondero and Ellington direct a “dividend” payment to Ellington (through Montage) for \$1,920,000.00.	Ex. 85, Email from CIBC, at BC SEN0000004243 (Apr. 24, 2020 19:01)
10.	Sentinel	Mainspring	04/24/2020	\$4,480,000.00	Dondero and Ellington direct a “dividend” payment to Dondero (through Mainspring) for \$4,480,000.00.	Ex. 84, Email from CIBC, at BC SEN0000004334 (Apr. 24, 2020 19:02)
11.	Sentinel	Montage	01/12/2021	\$750,000.00	Dondero and Ellington direct a “dividend” payment to Ellington (through Montage) for \$750,000.00.	Ex. 102, CIBC Bank Statement, at BC SEN0000610180 (Jan. 29, 2021)
12.	Sentinel	Mainspring	01/12/2021	\$1,750,000.00	Dondero and Ellington direct a “dividend” payment to Dondero (through Mainspring) for \$1,750,000.00.	Ex. 102, CIBC Bank Statement, at BC SEN0000610180 (Jan. 29, 2021)